



## DAKOTA WIND TRANSMISSION STUDY (DWTS) COMMENTS

June 16, 2004

Great Northern Power Development and Kiewit Mining Group (the Developers) appreciate the opportunity to provide comments to Western Area Power Administration (Western) at their June 16, 2004 public information forum in Bismarck, ND.

The Developers have spent a considerable amount of time and money developing a power plant project located just west of Dickinson ND called the South Heart Power Project (SHPP). The Developers believe they have a project that can be very viable and competitive. The SHPP will be a state-of-the-art power plant whose emissions will rank among the lowest in the country. Concomitant with the development of the SHPP the Developers have a keen interest in transmission study work and transmission development in the Dakotas.

In general the Developers support the DWTS work scope that has been proposed by Western and observe that Western has done a very good job in preparing the four proposed tasks outlined in the scope of work. Additionally, the Developers have the following specific comments/questions on each task:

Task 1: Analyze Non-Firm Transmission Potential Relative to New Wind Generation. The Developers are of the opinion that characterizing the non-firm transmission in ND and SD is an effort well worth pursuing. The Developer's specific comment or question is this: Will the transmission loading curves be made available to the public as soon as Western develops the curves?

Task 2: Assess Potential of Transmission Technologies Relative to New Wind Generation. The Developers support the use of Flexible AC Transmission (FACTS) devices to increase the transfer capability on the existing AC transmission network.

Task 3: Study Interconnection of New Wind Generation. The Developers support the interconnection of new wind generation at the seven wind generation zones as proposed.

Task 4: Study the Delivery to Market of New Wind Generation. The title of task 4 implies that only new wind generation will be considered in the study. The Developers are of the opinion that delivery of the power from their SHPP will most likely be delivered to similar customers, so the customers will have both wind for renewable energy and low-cost base load energy. Will the study consider new coal generation at a specific site? The Developers observe that significant new wind generation will not be developed in isolation and that other generation sources are also being currently developed in ND and SD. Therefore, for the study to have a meaningful outcome, the study must consider other new generation sources. The Developers request that the study consider their 500MW SHPP located at the Belfield substation as a new generation source. Also, will the integration of coal and wind generation as described in the Platt's Coal-Wind study be addressed and incorporated into the study?

Thank you for this opportunity to provide Western with the Developer's comments regarding the DWTS.